



# Proposed Plan for Parcels E and UC-3



## Update on Proposed Plan for Parcels E and UC-3

Hunters Point Naval Shipyard  
January 24, 2013



# Presentation Overview



- Discuss work to date to review/revise Proposed Plan
- Review select comments on draft final version and preliminary responses (for topics that may require further discussion)
- Review schedule for publishing Proposed Plan



## Work to Date



### **Draft Proposed Plan:**

- Submitted 25-October and received comments from EPA, DTSC, Water Board, and SFDPH

### **Draft Final Proposed Plan:**

- Submitted 20-December and included responses to comments on draft version
- Received additional comments from EPA, DTSC, Water Board, and SFDPH between 9-January and 14-January

### **Final Proposed Plan:**

- Prepared responses to comments (on draft final version) from EPA, DTSC, Water Board, and SFDPH
- Revised document based on additional input (with a few exceptions)



## Comments/Response to Discuss



### Synopsized Comment (EPA):

- Why does the preferred alternative not include removal of buried lines at IR-02 and IR-03? Should the Proposed Plan allow the flexibility to remove these buried lines?

### Preliminary Navy Response:

- The Navy does not intend to pursue unrestricted radiological release for IR-02 or IR-03 and will leave lines at these sites in place.
- Consistent with the Radiological Addendum to the FS Report, the Proposed Plan was revised to explain that the Navy's cleanup approach involves *"removing remaining storm drain and sewer lines in areas outside of IR-02 and IR-03 (where the buried lines will remain in place because the soil cover and ICs will prevent exposure to residual radiological contamination in these lines)."*



## Comments/Response to Discuss



### Synopsized Comment (EPA):

- Do the recommended remedies in IR-03 and IR-02 include a demarcation layer (similar to IR-07/18) to indicate the depth of soil removed for potential radioactivity? If so, should the Proposed Plan include this point?

### Preliminary Navy Response:

- Yes, the soil cover at IR-02 and IR-03 will include a demarcation layer. The Proposed Plan was revised to state that Alternative R-2 involves: *"Constructing a 2-foot thick soil cover throughout IR-02 and IR-03 to eliminate exposure pathways and installing a demarcation layer to mark the boundary between the existing surface and the soil cover."*



## Comments/Response to Discuss



### **Synopsized Comment (Water Board):**

- Regarding the cleanup at IR-03, please change the term “extent practical” to “maximum extent practicable.” This terminology better conveys the Navy’s intent to aggressively remove or treat contamination associated with the former oily waste ponds.

### **Preliminary Navy Response:**

- The Navy will continue to develop the cleanup approach for IR-03 in a manner that maximizes the removal or treatment of contaminated oil. However, the Navy does not believe that use of either “extent practical” or “maximum extent practicable” is necessary for the Proposed Plan. Accordingly, the subject term was deleted from the Proposed Plan.



## Comments/Response to Discuss



### **Synopsized Comment (EPA):**

- We understand that the Navy will develop options for shoreline protection features with and without reliance on rock under-armoring during the remedial design.

### **Preliminary Navy Response:**

- The Navy determined in the FS Report that, in order to comply with the RAOs, some form of armoring is needed under the natural materials (such as sand) proposed to be placed at the surface.
- During the RD, the Navy may consider changes to the conceptual shoreline protection design (such as the use of alternative materials) based on additional information or stakeholder input. However, the Navy does not plan to refine the design for the shoreline protection in a manner that eliminates the underlying armor material.



## Comments/Response to Discuss



### Synopsized Comment (SFDPH):

- Please re-phrase the soil RAO to use the term “minimize exposure” instead of “prevent exposure.” The majority of the Parcel E remedy is like Parcel B, C, D-1, G, UC-1, UC-2 and a portion of UC-3 – including a durable cover of hardscape or 2 feet of soil. We are planning for there to be time periods when the durable cover will be removed and construction workers, in particular, will be in contact with soil and there is no need to prevent contact because health risk from this contact is all within acceptable limits.





## Comments/Response to Discuss



### Preliminary Navy Response:

- The Navy does not agree that the requested changes are appropriate for the Proposed Plan. In addition to the regulatory input received on the Parcel E-2 ROD (requesting use of the term "prevent exposure"), the Navy wishes to clarify that the requested change would be inconsistent with RAOs developed for other HPNS parcels with similar final remedies as Parcel E. Most notably HPNS Parcel B includes both a soil cover with radiological ICs (for IR-07 and IR-18) and a durable cover throughout the rest of the parcel. The RAOs for Parcel B, as contained in both the Parcel B Proposed Plan and amended ROD, consistently use the term "prevent exposure" when discussing contamination in soil throughout the parcel.



## Schedule



- Create final layout for Proposed Plan:  
**January 23-25, 2013** (ongoing)
- Final check of Proposed Plan (and associated fact sheet):  
**January 28-29, 2013**
- Reproduce Proposed Plan and fact sheet (2,800 copies):  
**January 30 – February 11, 2013**
- Distribute Proposed Plan and fact sheet:  
**February 12, 2013**